

## **REMARKS**

Claims 1-3, 6, 8, 9 and 23-27 are currently pending in this application. Claims 1 and 23 have been amended to more particularly point out Applicants' invention. No new matter has been added to this application.

### **Rejection of Claims 23 and 25-27 under 35 U.S.C. § 102 (e)**

The Examiner has rejected claims 23 and 25-27 under 35 U.S.C. § 102 (e) as being anticipated by U.S. Patent Application No. 2001/0047373 A1 (Jones). The Examiner contends that Jones discloses Applicants' invention as claimed. Applicants respectfully traverse the rejection.

Applicants' invention is directed to an automated method for locating hotspots in a PDF file, and for creating cross-referenced AIUs in hypermedia documents. The PDF files are mixed mode documents, e.g., a mixture of text and a variety of different types of images such as black and white, grayscale and color. As recited in amended claim 23, the present invention analyzes the PDF file to determine the page layout of each page associated with the file. Also identified are text and non-text portions of a document. Because a PDF file can consist internally of an image file, without such analysis it is not possible to determine text portions from non-text portions, such as images. The present invention locates text and non-text areas in the document and applies different processing methods to each type of area. Context is determined for each area of interest and stored in structured manner that follows a predetermined syntax and grammar that allows the method to refer to that context while creating automatic hyperlinks between different documents and media types.

Jones discloses a computerized information display system that extracts text data, lists of keywords from an electronic document. The goal of the Jones invention is to index and visualize electronic documents. In the present invention, the PDF document is being analyzed to create an infrastructure (i.e., page layout) for linking between the document and even between segments of

the document. This is made possible by associating a layout and structure to the document. Jones does not create a structure for its electronic documents, but rather presumes that a structure already exists. Jones uses that existing structure to manipulate the document. The present invention is in fact a precursor to Jones in that the present invention defines the structure of the document which can then be used to manipulate the documents. As such, Applicants respectfully submit that Jones does not teach or disclose Applicants' invention. Applicants respectfully request that the rejection of claims 23 and 25-27 under 35 U.S.C. § 102 (e) be withdrawn.

**Rejection of Claims 1-3, 6, 8-9 and 24 under 35 U.S.C. § 103 (a)**

The Examiner has rejected claims 1-3, 6, 8-9 and 24 under 35 U.S.C. § 103 (a) as being unpatentable over Jones in view of U.S. Patent No. 6,344,906 B1 (Gatto). The Examiner correctly notes that Jones does not teach or disclose a black and white image processor that includes a pixel smearing component and an image filtering component. The Examiner contends that Gatto discloses a black and white image processor that includes a pixel smearing component and an image filtering component. The Examiner argues that it would have been obvious to one of ordinary skill in the art to modify Jones to include the image processor of Gatto. Applicants respectfully traverse the rejection.

Gatto discloses a circuit implemented on a single piece of silicon that is used as a scanner controller. Applicants submit that Gatto discloses hardware for scanning technologies. The present invention is directed to analyzing and determining document structure of a multimedia data file. Applicants have amended claim 1 to include a page layout analyzer for determining page layout for each page of the multimedia data file. Applicants' respectfully submit that Gatto does not teach or disclose a page layout analyzer. Applicants submit that neither Jones nor Gatto, whether taken alone or in combination, teach or disclose

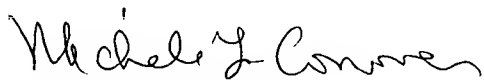
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Reply to Office Action of June 21, 2004

Applicants' invention as claimed. Applicants request that the rejection of claims 1-3, 6, 8-9 and 24 under 35 U.S.C. § 103 (a) be withdrawn.

**Conclusion**

Applicants respectfully submit that claims 1-3, 6, 8, 9 and 23-27, as amended, are in condition for allowance and request that a timely Notice of Allowance be issued in this case. The Examiner is invited to contact the undersigned should he have any questions in this matter.

Respectfully submitted,

A handwritten signature in cursive script, reading "Michele L. Conover".

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